230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF
RCRA ACTIVITIES
5HW-13

08 AUG 1983

John Masuka, Vice President Production
Heritage Ink Company
310 Gerri Lane
Addison, IL 60101

RE: Hazardous Waste Permit Application-Incomplete Part A
Facility Name (and EPA ID number) Heritage Ink Company ILD 050 576 214
Facility Address 310 Gerri Lane, Addison, IL 60101

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by September 8, 1983. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by September 8, 1983.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Diane Parker, the reviewer of your application, at (312) 886-3714 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF
RCRA ACTIVITIES

Mr. John Masuka, Vice President
Heritage Ink Company
310 Gerri Lane
Addison, Illinois 60101

APR 15 1983

RE: Part A Application (Paint Waste)
FACILITY NAME: Heritage Ink Company
USEPA ID NO.: ILD 050 576 214

Dear Mr. Masuka:

This letter serves to acknowledge that the United States Environmental Protection Agency (USEPA) has processed your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act (RCRA); however, further clarification is needed.

Please be advised that wastes from painting operations and paint production (USEPA Hazardous Waste Nos. F017, F018, K078, K079, K081, K082) have been temporarily suspended from regulation pending further study (40 CFR Part 261.31 and 261.32, Federal Register January 16, 1981). Wastes which exhibit characteristics of ignitability, corrosivity, reactivity, or EP toxicity as defined in 40 CFR Part 261 Subpart C, or which are listed in 40 CFR Part 261 Subpart D remain subject to regulation under RCRA.

Please reexamine your wastes pursuant to 40 CFR Part 262.11 (enclosed) and submit a revised Part A application to the Regional Office within 60 days if your waste is hazardous and regulated. If you find that your waste is not regulated, please withdraw your permit application. Your written withdrawal request, with a detailed explanation, must be signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed). Withdrawal of the permit application will eliminate further mandated permit processing procedures. Unless we receive a reply within 60 days, we will assume that your waste is regulated and that your facility is subject to the interim status standards including the financial responsibility and Part B permit requirements.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197, for additional information and copies of blank Part A applications. Please refer to "Part A Application, Paint Waste" in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

IL EPA

KJK 4/15/83

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES
5HW-13

28 SEP 1983

John Masuka, Vice President Production
Heritage Ink Comapny
310 Gerri Lane
Addison, IL 60101

USEPA ID. No. ILD 050 576 214
RE: Letter of Warning
Incomplete Part A Application

Dear Mr. Masuka:

On August 8, 1983, the United States Environmental Protection Agency (USEPA) returned your Part A Hazardous Waste Permit Application for the facility identified above, and requested that you complete the missing items marked on an attached checklist. We also asked that you return the updated Part A application within 30 days for missing items marked with an asterisk and 60 days for all other missing items. This deadline for resubmitting your completed Part A application has passed, and we have not received it.

In accordance with the provisions of 40 CFR 122.23(a)(3), a facility is not entitled to interim status if the Agency determines that the facility has submitted a deficient application. Since we have not received your completed Part A application, your facility has not met all of the requirements for interim status. Therefore, your facility is operating without a hazardous waste permit, in violation of Section 3005 of the Resource Conservation and Recovery Act (RCRA) as amended. This violation of Section 3005 of RCRA may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non compliance.

Please submit your completed Part A application to this Regional Office within fifteen days of receipt of this letter to:

RCRA ACTIVITIES
Region V
P. O. Box A 3587
Chicago, Illinois 60690-3587

If your status as a treatment, storage, and/or disposal facility has changed or if you have recently submitted the requested information, please advise us immediately. Please contact Diane Parker of my staff at (312) 886-3714, if you have any questions regarding this letter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

RECEIVED
OCT 26 1983
WASTE MANAGEMENT
BRANCH

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → ILD050576214 REACKNOWLEDGEMENT

HERITAGE INK CO
310 GERRI LANE
ADDISON IL 60101

INSTALLATION ADDRESS →

310 GERRI LANE
ADDISON IL 60101

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

INSTALLATION'S EPA I.D. NO. / NAME OF INSTALLATION

I. ILD050576214

II. INSTALLATION MAILING ADDRESS
HERITAGE INK COMPANY*
310 GERRI LN
ADDISON, IL 60101

III. LOCATION OF INSTALLATION
310 GERRI LN
ADDISON, IL 60101

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD050576214 2 1	A	800707

I. NAME OF INSTALLATION
HERITAGE INK CO

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 310 GERRI LANE

CITY OR TOWN: ADDISON ST.: IL ZIP CODE: 60101

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 310 GERRI LANE

CITY OR TOWN: ADDISON ST.: IL ZIP CODE: 60101

IV. INSTALLATION CONTACT
NAME AND TITLE (last, first, & job title): MASUCA JOHN VICE PRES

PHONE NO. (area code & no.): 312-543-2370

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: GEORGE MURPHY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M
F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
- [ ] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))
- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD050576214

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S															N/A	C
W	I	2	D	0	5	2	5	7	6	2	1	4	2	1		
1		2											13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

DETACH

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K049	K087				
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

DETACH

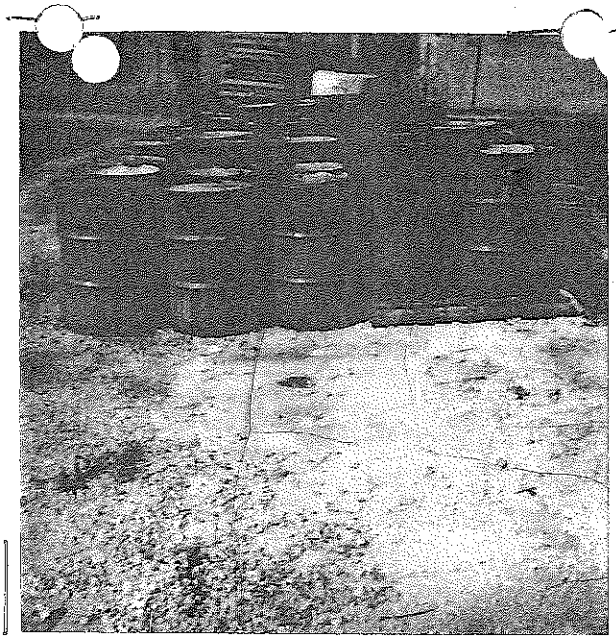
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John Meacham	Vice Pres. Production	7/2/80

Continued from page 4.

V. FACILITY DRAWING *(see page 4)*

Form Approved OMB No. 158-S80004



Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F ILD050576214

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

ILD050576214
HERITAGE INK CO
310 GERRI LANE
ADDISON, IL 60101

PLEASE PLACE LABEL IN THIS SPACE

310 GERRI LANE
ADDISON, IL 60101

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced** terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment** area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: HERITAGE INK CO

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 MASUKA JOHN VICE PRES PRODUCTION	312 543 2552

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 310 GERRI LANE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ADDISON	IL	60101

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 310 GERRI LANE

B. COUNTY NAME

DU PAGE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 ADDISON	IL	60101	043

NTINUED FROM THE FRONT

I. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
(specify)	C 7 *(specify)*
C. THIRD	**D. FOURTH**
(specify)	C 7 *(specify)*

II. OPERATOR INFORMATION

A. NAME

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO (66)

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

(specify)

D. PHONE *(area code & no.)* — C A

E. STREET OR P.O. BOX

F. CITY OR TOWN | G. STATE | H. ZIP CODE

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☐ NO (52)

EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	D. PSD *(Air Emissions from Proposed Sources)*
T N	C T 9 P
B. UIC *(Underground Injection of Fluids)*	**E. OTHER *(specify)***
T U	C T 9 *(specify)*
C. RCRA *(Hazardous Wastes)*	**E. OTHER *(specify)***
T R	C T 9 *(specify)*

I. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show he outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste reatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface vater bodies in the map area. See instructions for precise requirements. N

II. NATURE OF BUSINESS *(provide a brief description)*

MANUFACTURE OF NO HEAST AND HEATSET TYPE OFFSET PRINTING INKS

A

III. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting f. information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 ch. te ch).

23

orm Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

5	F	I	L	D	0	5	0	5	7	6	2	1	4	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C 8 — YR. — MO. — DAY

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. — MO. — DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
	S01	55	G	
2				
3				
4				

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Continued from the front.

II. PROCESSES *(continued)*

E SPACE FOR ADDITIONAL PROCESS CODES OR R DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

OTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by ore than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

XAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds r year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes e corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 00 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

O.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

inued from page 2.

'E: Photocopy this page before completing if you have e than 26 wastes to list. 23

orm Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
I	L	D	0	5	0	5	7	6	2	1	4	3	1	

FOR OFFICIAL USE ONLY

1	2	13	14	15
W	DUP	2	DUP	

SCRIPTION OF HAZARDOUS WASTES (continued)

NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
22	K078	17,325	P	delisted	
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

ntinued from the front.

. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

1	2	3	4	5	6	7	8	9	10	11	12
I	L	D	0	5	0	5	7	6	2	1	4

13 14 15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32	33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	56 - 58 / 59 - 61 / 62 - 65
15 16 - 55	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		
15 16 - 45	15 16 - 50	51 52	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
JOHN MASUKA	John Masuka	10/9/80

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
MASUKA	John Masuka	10/9/80

FK&K
FRENCH KEZELIS & KOMINIAREK, P.C.

Attorneys at Law
33 North Dearborn Street • Suite 1800 • Chicago, IL 60602
(312) 782-0634 • Fax (312) 782-1432

2100 Manchester Rd. • Suite 203 • Wheaton, IL 60187
(708) 510-0770 • Fax (708) 510-9005

COPY

PLEASE REPLY TO:
Wheaton Office
WRITER DIRECT DIAL NO:
708/510-0770

July 2, 1992

Lawrence Raphael, Esq.
77 West Washington Street
Suite 1800
Chicago, Illinois 60602

Re: Mavigliano vs. Delta Color, et al.
Court No. 91 L 605
Our File No. W10735-5283

Dear Larry:

Pursuant to a conversation I had with Kevin Pierard on June 25, 1992, please send Mr. Pierard a copy of all documents, reports, letters and findings of your environmental consultant, Inland Consultants. Mr. Pierard would like to see these findings pursuant to making a determination regarding the Mavigliano property.

Very truly yours,

Eric Friedemann

Eric Friedemann

EF/jll
cc: McKenna, Storer, Rowe, White and Farrug
Attn: H. Evan Williams, Esq.

Reif, Rosenbaum & Heftman
Attn: Ronald N. Heftman, Esq.

United States Environmental Protection Agency
Attn: Mr. Kevin Pierard, Chief

FK&K
FRENCH KEZELIS & KOMINIAREK, P.C.
Attorneys at Law
33 North Dearborn Street • Suite 1800 • Chicago, IL 60602
(312) 782-0634 • Fax (312) 782-1432
2100 Manchester Rd. • Suite 203 • Wheaton, IL 60187
(708) 510-0770 • Fax (708) 510-9005

PLEASE REPLY TO:
Wheaton Office
WRITER DIRECT DIAL NO:
708/510-0770

June 30, 1992

United States Environmental
Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Attn: Mr. Kevin M. Pierard, Chief

Re: Mavigliano vs. Delta Color, et al.
Court No. 91 L 605
Our File No. W10735-5283

Dear Kevin:

To confirm our recent discussions, I would appreciate receiving a copy of all reports and documents generated by your office and that of your environmental testing service. I will, of course, guarantee payment of any charges associated with copying these documents.

Thank you for your cooperation. I look forward to hearing from you.

Very truly yours,

Eric Friedemann

Eric Friedemann

EF/jll

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/[illegible]

Refer to: S 0430030019 -- DuPage County
Delta Color, Inc.
ILD [illegible]
RCRA - Permits

May 6, 1988

Delta Color, Inc.
[illegible] Lane
Addison, Illinois 60101

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-729. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for those units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment units present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the units and, if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST, HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1988. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1985. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1985. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Keare at 217/782-6975.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permits Section
Division of Land Pollution Control

LWE:JRK:bks/1238S/1264y/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USEPA Region V

ILLINOIS EPA
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153

657

312/345-9780

Refer to: 04300505 - DuPage County - Addison/Delta Color, Inc.
ILD050576214

March 31, 1982

Delta Color, Inc.
310 Gerri Lane
Addison, Illinois 60101

Delta Color, Inc.
5517 New Peachtree Road
Chamblee, GA. 30341

Attn: John Masuka

Dear Mr. Masuka:

An inspection of your facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on March 5, 1982. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.13(a), the owner/operator must obtain a detailed chemical and physical analysis of waste treated or stored at the site. The owner/operator is deficient in that no such analysis had been performed.

Pursuant to 40 CFR 265.13(b), the owner/operator must have on file at the facility a detailed written waste analysis system describing the procedures to be used to compile data required under 40 CFR 265.13(a). The owner/operator is deficient in that no such plan was present at the site on the date of the inspection.

Pursuant to 40 CFR 265.14 the owner/operator must prevent unknowing entry to the active portions of his facility by providing 24-hour surveillance or have a means to control entry and an artificial or natural barrier unless contact with the waste will not cause injury to livestock or persons and will not cause violations of RCRA. Your facility is deficient in that 24 hour surveillance is not provided and/or no artificial or natural barrier is situated around the facility.

Pursuant to 40 CFR 265.15, the owner/opperator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors and/or discharges, frequency-of-inspection schedules, lists of safety and emergency equipment, and logs to record each such inspection. The owner/operator is deficient in that inspection records and schedules are not maintained at this facility.

Pursuant to 40 CFR 265.16, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. The owner/operator is deficient in that personnel training records were not available at the time of the inspection.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that a contingency plan was not available at the time of the inspection.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.

2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.

3) Records and results of waste analyses and trial tests.

4) Summary reports and details of all incidents that require implementation of the contingency plan.

5) Records and results of inspections.

6) Monitoring and testing data.

7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that an operating record was not available at the time of the inspection.

The owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. These requirements are pursuant to 40 CFR 265.112. Your facility is deficient in that a closure plan was not available at the time of the inspection.

Facilities that store containers of hazardous waste must use nonleaking containers in good condition and containers that are compatible with the wastes in them. The containers must be stored closed and handled so as to not cause ruptures or leaks. Containers must be inspected at least weekly. Containers holding ignitable or reactive waste must be at least 50 feet from the facility property line. These requirements are pursuant to 40 CFR Part 265 Subpart I. Your facility is deficient in that the containers are not inspected weekly for leaks and defects and that the containers are stored less than 50 feet from the facility property line.

Pursuant to 40 CFR 262.34(a) an owner/operator may accumulate hazardous waste on-site without a permit for 90 days or less, provided that (among other requirements) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and each container is properly labeled and marked according to Section 262.31 and 262.32 of the Regulations. At the time of the inspection, the containers were not properly marked and labeled in accordance with DOT Regulations.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Craig J. Liska of my staff at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:CJL:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _ _ _ _ _ _ _ _
(11) (18)

_____ CO. - L.P.C. Region #_____ Date __/__/__
(20) (25)

_____/_____ Letter Sent (Yes or No)____
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __ : ___ m Weather _____
Ground Water( ) Surface( ) Other( ) To __ : ___ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ____ ____ ____
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( )____ (31)

IMPROVED

SAME

DETERIORATED

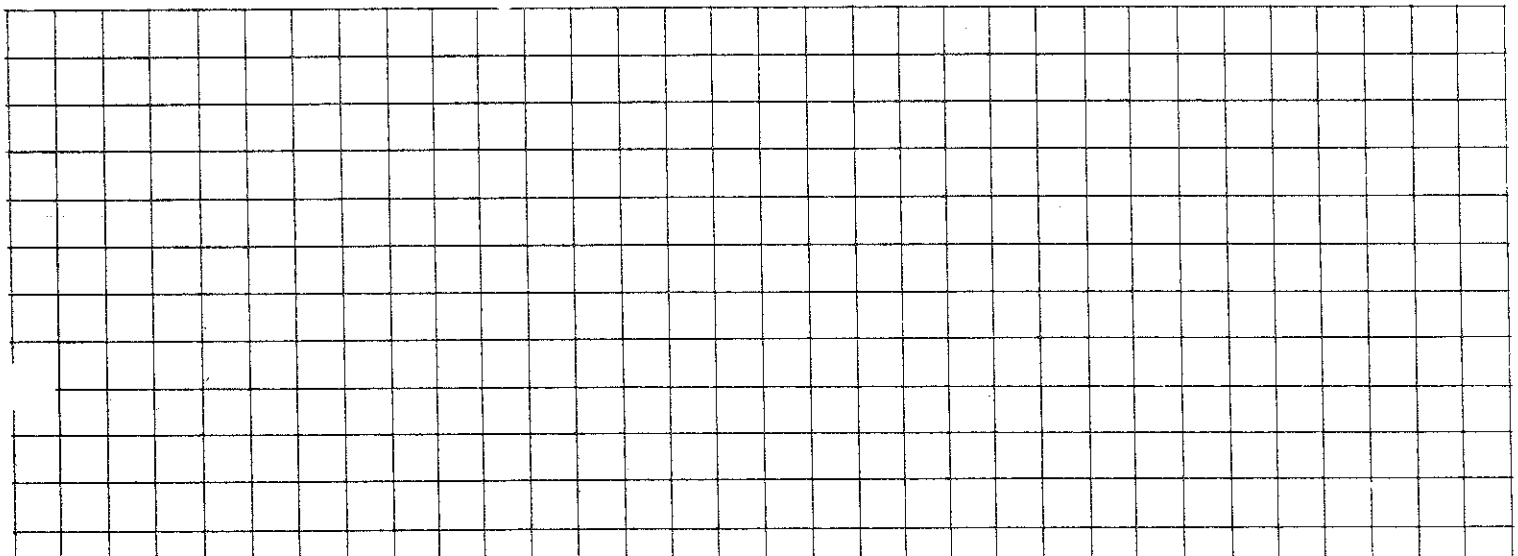
LPC 4 1/79 5,000

I S or D ____ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:



0430050S
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD005057621 4
EPA IDENTIFICATION NUMBE

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Delta Color, Inc.

(B) Street: 310 Gerri Lane

(C) City: Addison (D) State: IL (E) Zip Code: 60101

(F) Phone: (312) 543-2550 (G) County: DuPage

(H) Operator: Same

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: Delta Color, Inc.

(P) Street: 5517 New Peachtree Rd.

(Q) City: Chamblee (R) State: Ga (S) Zip Code: 30341

(T) Phone: (404) 458-7761 (U) County:

(V) Date of Inspection: 3-5-82 (W) Time of Inspection (From) 9:30 (To) 10:40

(X) Weather Conditions: Sunny ≈30°

Non-applicable information contained on pages 10 thru 18 have been omitted

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
John Masuka	V.P. of Production	(312) 543-2550

(Z) Inspection Participants	Agency/Title	Telephone
Craig J. Liska	IEPA/EPS I	(312) 345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
Craig J. Liska	IEPA/EPS I	345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

___A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	N/A	___
2. Facility expansion?	___	___	N/A	___
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	___	✓	___	Analysis only showed % chlor...
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	___	✓	___	___
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	N/A	___
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	___	✓	___	No guard
2. Artificial or natural barrier around facility?	___	✓	___	No fencing
3. Controlled entry?	✓	___	___	___
4. Danger sign(s) at entrance?	___	✓	___	___
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	___	✓	___	No records kept
2. Records of operator error?	___	✓	___	___
3. Records of discharges?	___	✓	___	___

*Not Inspected

... GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	no inspection schedule
5. Safety, emergency equipment?	---	✓	---	
6. Security devices?	---	✓	---	
7. Operating and structural devices?	---	✓	---	
8. Inspection log?	---	✓	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	no personnel training records
2. Job descriptions?	---	✓	---	
3. Description of training?	---	✓	---	
4. Records of training?	---	✓	---	
5. Have facility personnel received required training by 5-19-81?	---	✓	---	
6. Do new personnel receive required training within six months?	---	✓	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	
2. No smoking signs?	✓	---	---	
3. Separation and protection from ignition sources?	✓	---	---	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			hooked up with local fire dp
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of Emergency Equipment:

	Yes	No	NI*	Remarks
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	✓		
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? ✓ ___ ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	___	✓	___	no contingency plan
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	___	✓	___	_____
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	___	✓	___	_____
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	___	✓	___	_____
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	___	✓	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?		✓		
2. Is coordinator familiar with all aspects of site operation and emergency procedures?		✓		
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		✓		
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			N/A	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?			N/A	
2. Are records of past shipments retained for 3 years?			N/A	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?			N/A	

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?		✓	no operating record
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		✓	
c.	The location and quantity of each hazardous waste within the facility?		✓	
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		N/A	
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		✓	
f.	Reports detailing all incidents that required implementation of the Contingency Plan?		✓	
g.	All closure and post closure costs as applicable? (Effective 5-19-81)		✓	

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		✓		No closure plan
2. Has this plan been submitted to the Regional Administrator			N/A	
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			N/A	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?		✓		
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)		✓		

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	N/A	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			
(C) Does the owner or operator submit exception reports when needed?			N/A	not needed yet

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)		✓		no labels
(C) If required, are placards available to transporters of hazardous waste?		✓		no placards

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	N/A	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?			N/A	not needed yet

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?		✓	~~N/A~~	

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?			N/A	not exporting Haz. Waste
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	N/A	

II. INTERNATIOINAL SHIPMENTS

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	
B. Are signed completed manifest(s) on file?	___	___	___	

V. MISCELLANEOUS

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

This facility is currently a generator and storage facility of a hazardous waste consisting of methylene choride, petroleum solvents and waste resins. This chlorovated solvent is used to clean ink off the floors. Approximately 50 drums of the waste are currently being stored on-site. The following deficiencies were observed at the time of this inspection: no detailed chemical analysis of the waste, no waste analysis plan on file, no security measures other than controlled entry, no operator inspections, no personnel training records, no contingency plan, no operating records, no closure plan, no weekly inspection of containers, containers stored less than 50 feet from property line, containers not labeled in accordance with DOT regulations and no transporter placards available on site. Rather than correcting the previous deficiencies, Mr. Masuka stated that he intends to change his floor cleaning process to utilize a floor scrubber and a non-hazardous soap cleaner. He also stated that he is making arrangements to have the entire hazardous waste inventory hauled off-site. After doing so, Mr. Masuka intends to withdrawl from the program.

11/30

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 24, 1992

Mr. John Mavigliano
1130 S. Michigan Avenue
Apt. 3410
Chicago, IL 60605

Re: Visual Site Inspection
Heritage Ink Company/Delta Colors, Inc.
Addison, Illinois
ILD 050 576 214

Dear Mr. Mavigliano:

As indicated in the letter of introduction sent to you on March 24, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

HERITAGE INK COMPANY/DELTA COLORS INC.
ADDISON, ILLINOIS
ILD 050 576 214

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 050576214
Date Prepared	:	September 8, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL2X
Prepared by	:	B&V Waste Science and Technology Corp. Stephen Mehay
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Delta Colors Inc. (Delta Colors) facility, formerly Heritage Ink Company, in Addison, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in the prioritization of RCRA facilities for corrective action.

The Mavigliano family built the manufacturing building in 1970 and has been the owner ever since. Colonial Ink Co. began leasing the building and manufacturing inks for commercial printing in 1970. Later, Colonial Ink Co. changed their corporate name to Heritage Ink Company. Heritage continued to lease the building and manufacture inks at the facility until March 1981, when their operation was bought out by Delta Colors. Delta Colors leased and manufactured inks at the facility until March 1990. The facility has remained vacant since Delta Colors departed.

The Delta Colors facility manufactured composite black (or newspaper black) no-heat ink and heat-set type off-set web inks for commercial printing. The facility generated waste cleaning solvent from 1970 until June 1982. The waste cleaning solvent was stored in drums on an area on the north side of the facility. In June 1982 the facility discontinued use of the cleaning solvent and began using a water-based floor cleaner. The solvent was a mixture of solvents which did not become a listed hazardous waste until 1985. From June 1982 until March 1990, a waste non-hazardous water-based floor cleaner was generated and discharged to the municipal sanitary district. Other hazardous and non-hazardous waste streams that may have been generated at the facility are unknown. The facility occupies approximately half an acre in an industrial area. The number of employees Delta Colors maintained at the facility is unknown.

The facility's present regulatory status is that of an inactive non-handler. Heritage Ink submitted an RCRA Part A permit application in 1980. In 1988, the Illinois Environmental Protection Agency stated that Heritage Ink was a protective filer because during the time they managed the spent solvent it was not a listed hazardous waste and did not exhibit any hazardous characteristics. Delta Colors applied to IEPA for withdrawal of its Part A Permit Application in 1990. No response to the application was found during this investigation.

The PA/VSI identified the following SWMU and AOC at the facility:

Solid Waste Management Unit

1. Drum Storage Area

Areas of Concern

1. Water Discharge Area

The potential for release from the SWMU to groundwater, surface water, and air is low. The potential for release to on-site soils is moderate. The unit is a designated area underlain by asphalt. Wastes were stored in steel drums. There was one documented release of an unspecified amount of ink from the unit to on-site soils. Documentation that sampling and clean up advised by an Illinois Environmental Protection Agency (IEPA) inspector was not found.

There was a document release of an unspecified amount of a non-contact cooling water on the east side of the facility (AOC #1). The water was discharged from pipe in the east wall of the facility to an asphalt lot. Water runs from the lot to a storm sewer in Gerri Lane. The sewer empties into Salt Creek. No documentation of follow-up actions regarding this discharge was found during this investigation. The potential for release to surface water and on-site soils is moderate. The potential for release to groundwater and air is low.

Drinking water in the Village of Addison is now supplied by the City of Chicago, from Lake Michigan. The nearest surface water body, Salt Creek, is approximately one-and-a-quarter miles east of the facility. There are two wetlands within one-half mile of the facility. The nearest residential area is approximately one-quarter mile south. Facility access is controlled by Schaumberg Securities, which operates 24-hours a day.

BVWST recommends that the soils under the asphalt of the drum storage area (SWMU #1) be sampled. Also, the flow and constituents of the water discharged to the water discharge area (AOC #1) should be further investigated.

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Attachments

A	EPA PRELIMINARY ASSESSMENT FORM 2070-12
B	VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
C	VISUAL SITE INSPECTION FIELD NOTES
D	IEPA MEMO DESCRIBING SPENT CLEANING SOLVENT

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1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in Region 5. As a team member with PRC under the TES 9 contract, B&V Waste Science and Technology Corp. (BVWST) conducted the PA/VSI for the Delta Colors facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Delta Colors facility in Addison, Illinois. The PA was completed on March 24, 1992. BVWST gathered and reviewed information from Illinois Environmental Protection Agency (IEPA), and from EPA Region 5 RCRA files. In addition, BVWST reviewed information from the following sources: Federal Emergency Management Agency (FEMA), United States Geological Survey (USGS), Illinois State Geologic Survey (ISGS), National Wetlands Inventory Maps, and United States Department of Agriculture (USDA). The VSI was conducted on March 25, 1992. It included interviews with the property owner and a walk-through inspection of the facility. One SWMU was identified at the facility.

Attachment A is EPA Form 2070-12. BVWST completed this form using information gathered during the PA/VSI. Attachment B is a summary of the VSI including one inspection photograph. Attachment C is the field notes from the VSI. Attachment D is the IEPA memo describing the constituents and regulatory status of the spent cleaning solvent.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Delta Colors facility is located at 310 Gerri Lane in Addison, DuPage County, Illinois (latitude 41° 54' 34" north; longitude 87° 59' 45" west) as shown in Figure 1. The facility occupies approximately one-half acre in an industrial area.

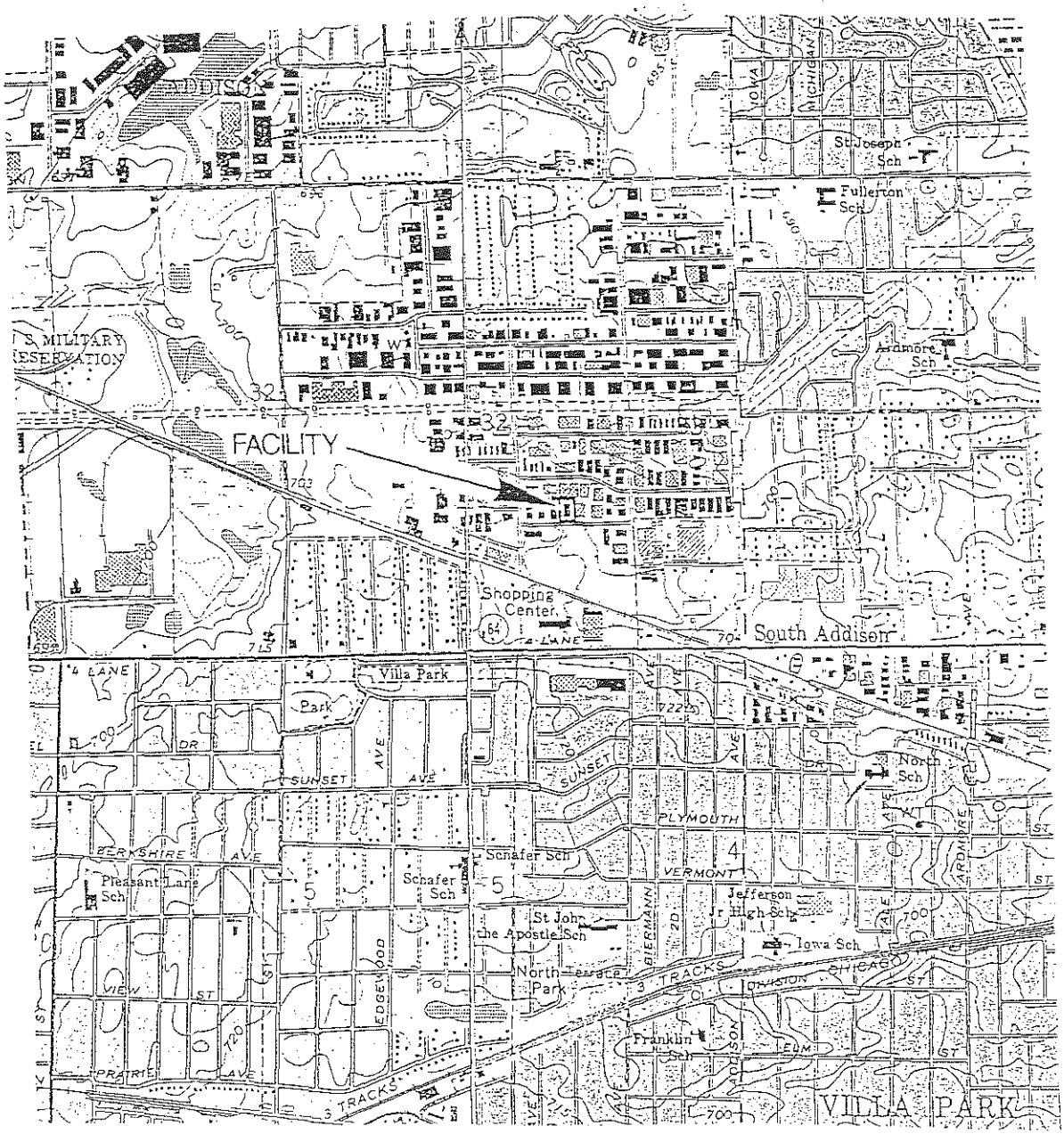
The Delta Colors facility is bordered on the north by Porter Cable, on the west by Barnebey and Sutcliffe Corp., on the south by Condor Tool and Manufacturing and DuAll Inc., and on the east by Trans Shape Inc.

2.2 FACILITY OPERATIONS

The Mavigliano family owned the land when the manufacturing building was built in 1970 and continues to own it today. Colonial Ink Co. began leasing the building and manufacturing inks in 1970. The process by which inks were manufactured appears to have remained constant while the operators changed. Colonial changed their name to Heritage Ink in the late 1970s. Heritage Ink operated the facility until March 1981, when they were bought out by Delta Colors. Delta Colors continued to lease the building from the Maviglianos and manufactured inks until March 1990, when they terminated their lease and vacated the building. The property has been vacant since March 1990.

Delta Colors manufactured composite black (or newspaper black) no-heat ink, and heat-set type off-set web inks for commercial printing. The inks were used in magazine production and newspaper inserts.

Raw materials, including varnishes and pigment, were delivered and stored in 55-gallon drums. Drums were stored on the north and west sides of the facility. Delta Colors vacated the property in March 1990. Three unsuccessful attempts were made to contact Delta Colors corporate office, (Chamblee, Georgia (404) 885-9946). As a result, specific information about their ink production and their handling of other non-hazardous waste streams could not be obtained.



SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

QUADRANGLE LOCATION

N

SOURCE: USGS 7.5 MINUTE SERIES, ELMHURST QUADRANGLE, 1980

DELTA COLORS
ADDISON, ILLINOIS

FIGURE 1
FACILITY LOCATION

SCIENCE AND TECHNOLOGY CORP.

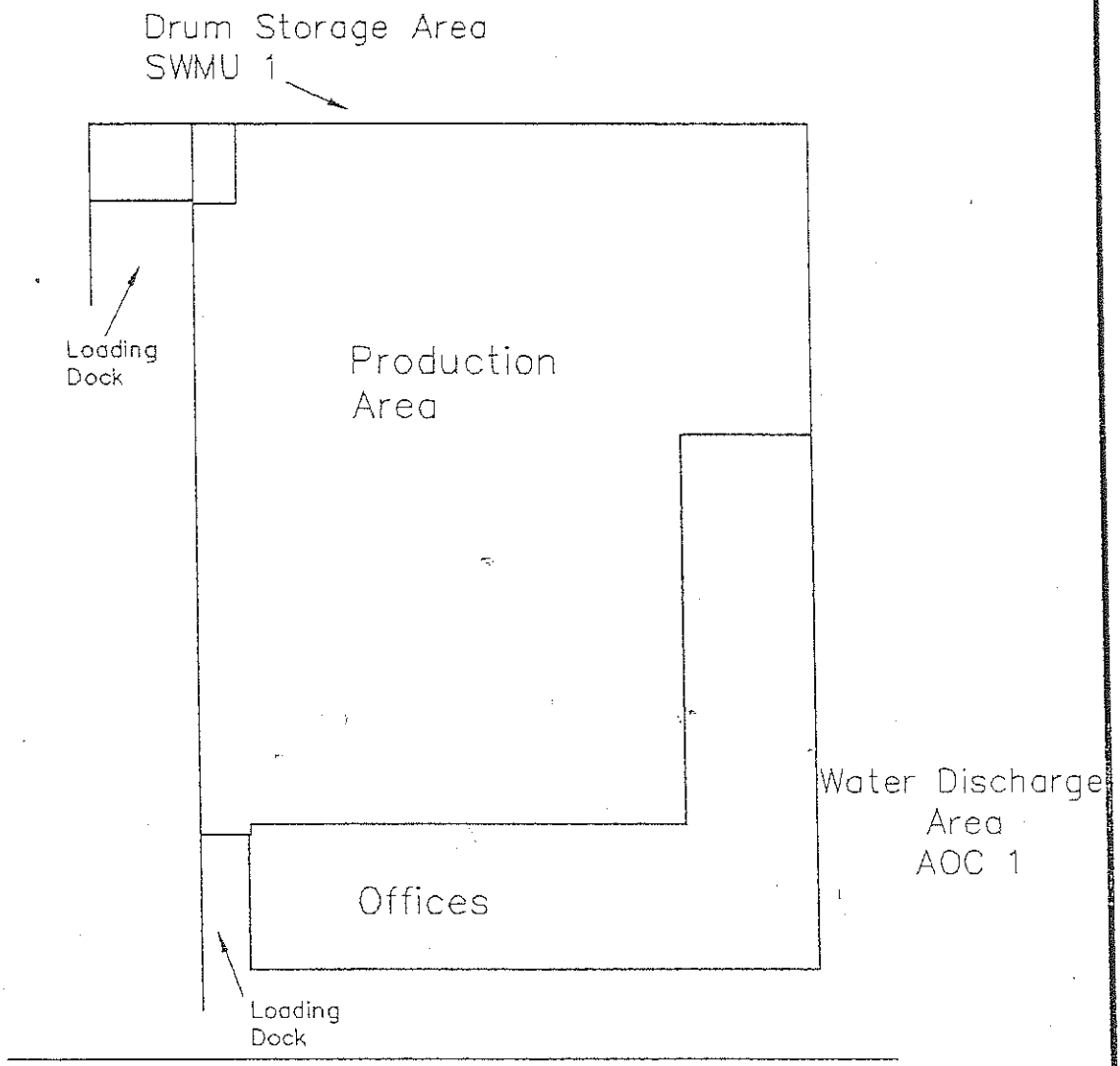
The facility consists of one 12,000-square-foot building. The rest of the ground is covered by either asphalt or gravel. The building is divided into a large production area and office space.

There are no active waste management units at the vacant facility. In 1980, when Heritage Ink filed their Part A permit application, they listed a drum storage area. This area handled drums of spent cleaning solvent and drums of raw materials. There is no information regarding other hazardous or non-hazardous waste management units. There are no plans to lease the facility in the near future. The Maviglianos have filed suit against Delta Colors for repair of damages incurred during their term of lease. The facility's SWMU is identified in Table 1. Figure 2 shows the facility layout, including the SWMU location.

2.3 WASTE GENERATING PROCESSES

The primary wastes stream known to have been generated at the Delta Colors facility were a non-hazardous cleaning solvent, and a non-hazardous water-based cleaning agent. Both wastes were generated from cleaning spilled inks from the concrete floor. The cleaning solvent was not used to clean ink mixing reactors because the ink produced was not changed between batches. The spilled ink was thick enough that most of it was put back in the process line. Residual ink was removed from the floor with cleaning solvent. The solvent was composed of 70% mineral spirits, 25% perchloroethane, and 5% methylene chloride (IEPA, 1988). Also, IEPA states that the spent cleaning solvent was not a hazardous waste because it is a mixture of solvents. On the facility's Part A Permit Application the waste was given the EPA waste code K078 (Heritage, 1980). The used spent cleaning solvent was stored in drums on the drum storage area (SWMU #1) until pick-up for disposal. In 1982, approximately six drums of spent cleaning solvent were reportedly generated monthly. A March 1982 IEPA RCRA inspection noted that Delta Colors had allowed approximately 100 drums of spent cleaning solvent to accumulate. In the Special Waste Hauling Manifest the spent cleaning solvent was given the waste code D001 (Delta Colors, 1982). The spent cleaning solvent was hauled offsite by either Mr. Frank Inc., of South Holland, Illinois, or Strand Trucking Co., of Crestwood, Illinois. Both haulers delivered the solvent to American Chemical Services of Griffith, Indiana, for solvent blending into an unspecified mixture.

After June 1982, Delta Colors began using a non-hazardous, water-based cleaning agent in conjunction with a floor scrubber. The generation rate and the handling procedures for the spent water-based cleaning agent are unknown. Delta Colors claims the waste was discharged to the municipal sewer system but the Village of Addison has no record of an industrial waste water permit for the facility (Village of Addison,



DELTA COLORS
ADDISON, ILLINOIS
PA/VSI

FIGURE 2
FACILITY LAYOUT

SCIENCE AND TECHNOLOGY CORP.

Source: Modified from Delta Colors inspection sketch, March 1992

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Drum Storage Area	No **	Inactive

Note:

* A RCRA hazardous waste management unit is one that requires or formerly required submittal of a RCRA Part A or Part B permit application.

** Because the waste did not get listed as a hazardous waste on this unit in 1985, they were not required to submit a Part A permit application. They did, however, submit a "protective" Part A permit application that listed this area.

1992b). The facility has never had an NPDES permit or any permitted air emissions. Table 2 summarizes the waste generated at the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the Delta Colors facility.

On September 4, 1985, the Village of Addison Fire Department filed a complaint with the IEPA Division of Land Pollution Control (IEPA, 1985a). They noted that Delta Colors had a sloppy drum storage area and that an unspecified amount of ink had been spilled on the ground. During a follow-up inspection, several hundred 55-gallon drums containing raw materials were observed on the northern side of the building (IEPA, 1985b). The IEPA inspector pointed out an unspecified number of areas of visible spillage near the drum storage area and advised that the soil be sampled and cleaned up. The IEPA file review did not reveal any attempts by Delta Colors to undertake the advised soil sampling and clean-up. However, no outstanding IEPA violations were discovered.

On June 3, 1986, an owner of a neighboring property complained that Delta Colors had discharged colored fluid onto his property (IEPA, 1986a). During a follow-up inspection, the inspector noted that the facility was discharging, on the east side of the facility, a non-contact cooling water used to cool a pigment grinding machine (IEPA, 1986b). The IEPA inspector indicated that the water was clear and had no odor, however, the problem would be referred to the Division of Water Pollution Control for follow up. No follow-up documentation was noted in the IEPA file review.

During the VSI there was a pipe discharging water on the east side of the facility. This was the only discharge pipe on the east side of the building, therefore it must be the pipe referred to in the June 3, 1986 complaint. The water was being pumped from the sunken loading docks on the southwest and northwest corners of the facility. The water was clear, odorless and was flowing across asphalt on the east side of the facility into the storm sewer on Gerri Lane. The storm sewer drains into Salt Creek as described in Section 2.6.2 of this report. The area where the water is being discharged is designated as AOC 1.

No evidence of past releases were noted during the VSI.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Cleaning Solvent/NA**	Cleaning spilled inks	1
Water-Based Cleaning Agent	Cleaning spilled inks	None***

Notes:

* Primary management unit refers to a SWMU that manages or formerly managed the waste.

** The IEPA stated that the spent cleaning solvent was not a hazardous waste.

*** The waste was discharged directly to the municipal sanitary district without a permit.

2.5 REGULATORY HISTORY

Heritage Ink submitted a RCRA Part A permit application on October 5, 1980 to the EPA. This application listed a S01, container storage area with a capacity of 55 gallons (Heritage, 1980). The application listed one waste, K078, with an estimated annual generation rate of 17,305 pounds. This waste code does not exist in the Code of Federal Regulations (CFR, 1990).

According to a 1988 IEPA memo, Heritage Ink was a protective filer (IEPA, 1988) (Appendix D). The IEPA states that the facility never handled a hazardous waste because the spent cleaning solvent was a mixture of solvents, not a listed hazardous waste. Also, because the waste was sent for solvent blending it would have been exempt from RCRA regulation. The IEPA notified Delta Colors that they did not handle a regulated hazardous waste and therefore, they should withdraw their Part A Permit Application (IEPA, 1988b). In February 1990, Delta Colors filed a facility notification withdrawal request form with the IEPA (Delta Colors, 1990). No response to the request was returned by IEPA or EPA.

The facility's current status is that of an inactive non-handler (Delta Colors, 1990). Delta Colors vacated the property in March 1990.

In the past Delta Colors has had RCRA compliance problems. The problems resulted from Delta Colors' failure to comply with RCRA regulations because of the facility contended that they were a non-handler. Delta Colors facility was inspected by the IEPA in 1982, 1987, and 1989 (IEPA, 1982, 1987, 1989). Deficiencies noted include no waste analysis, no waste analysis system, no 24-hour surveillance, no proper record keeping, no contingency plan, no written operating record, no closure plan, improper container storage, and improperly labeled containers. The facility has requested that their Part A permit application be withdrawn (Delta Colors, 1990), because according to the IEPA (IEPA, 1988b), Delta Colors did not store a hazardous waste.

The facility has no history of odor complaints from area residents. In addition, the facility is not required to have operating air permits or a National Pollutant Discharge Elimination System (NPDES) permit.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater near the Delta Colors facility.

2.6.1 Climate

The climate in DuPage County is classified as humid continental type. It is cold and snowy in the winter and warm in the summer. The average daily temperature is 49F. The lowest average daily temperature is 13.3F in January, and the highest average daily temperature is 82.4F in July. The total annual precipitation for the county is 33 inches (USDA, 1979). The heaviest 24-hour rainfall was 9.35 inches in August 1987 (NWB, 1991). The mean annual lake evaporation for the area is 32 inches (IEPA, 1976)

The prevailing wind is from the west in the winter, from the west and south-southwest in the spring, from the southwest in the summer, and from the south and southwest in the fall. The average wind speed is 10.3 miles per hour (Ruffner, 1977).

2.6.2 Flood Plain and Surface Water

The Delta Colors facility is not located in a 500-year flood plain (FEMA, 1987). The nearest surface water body, Salt Creek, flows approximately one and a quarter miles east of the facility and is used for recreational purposes. Surface water drainage at the facility is to the east. Rain water runs from the roof of the building, through downspouts, to the ground on the eastern side of the facility. The water then flows south to a channel along Gerri Lane. It is routed along Gerri Lane into the Village of Addison storm sewers, which empty into Salt Creek.

Delta Colors discharged a non-contact cooling water to the ground on the east of the building. In addition, they discharged a water-based cleaning fluid, which replaced the hazardous floor cleaning solvent, to the municipal sanitary works. The discharge was reportedly permitted by the Village of Addison (IEPA, 1982), but the Village of Addison has no record of an industrial waste water permit for the facility (Village of Addison, 1992b).

Two wetlands are approximately one-half mile from the Delta Colors facility. Both are part of the palustrine system and are of the emergent class. The wetland southeast of the facility is a semi-permanently flooded part of the non-tidal water regime and occupies approximately three acres. The wetland west of the facility is a seasonally flooded part of the non-tidal water regime and occupies approximately three acres (USFW, 1981).

2.6.3 Geology and Soils

Soil at the Delta Colors facility is classified as urban land (USDA, 1979). The underlying soil is classified as clayey orthents complex. Generally the unit is less than 75 percent modified urban land, but the units of modified and unmodified land are too small to differentiate. The soil formerly had a surface of silt loam, silty clay loam, or silty clay and a subsoil of silty clay or clay. Many areas of the Urban Land unit have been graded so that water drains to the edges of lots and into sewer systems. Low spots and undeveloped areas collect water and are slow to drain (USDA, 1979).

The sediment and rock occurrence expected at the site is an unknown thickness of unconsolidated sediments originating from Pleistocene glacial action (ponded-water clays, tills, and outwash) overlying bedrock composed of sedimentary rock units of Paleozoic age. No site-specific information is currently available about the character of either the unconsolidated materials or the bedrock. However, Berg and Kempton (1988) have used data from the Illinois State Geological Survey's (ISGS's) extensive collection of well logs to prepare a series of maps that generally indicate the probable occurrence of sediments and/or bedrock within the interval from the surface to a depth of 50 feet. For the area around Delta Colors, they indicate at least 50 feet of silty clayey till with no indication of sand or gravel units. (Bedrock is described in section 2.6.4).

Based on geologic mapping data gathered by the ISGS, Berg and others (1984) prepared a series of maps evaluating the potential for hazardous substances released at the surface to migrate into the first subjacent water-producing zone. For the Delta Colors facility, they deem the potential to be low, due to fairly uniform, relatively impermeable till to a depth of at least 20 feet.

2.6.4 Groundwater

In northeastern Illinois, groundwater for public and industrial use is or has been obtained from four different water-producing zones within the geologic succession. The first zone is the groundwater occurring within the unconsolidated Pleistocene sediments. The second zone is an interval of shallow bedrock units that are generally in contact with the Pleistocene sediments. The third and fourth zones are two deeper intervals of water-producing rock units. Hughes and others (1966) discuss the character of each of the four zones, their hydrologic properties, and the location of their recharge zones. Virtually all wells producing municipal or industrial water within the Greater Chicago area pump from one or both of the deep bedrock aquifer zones (Bergstrom, et al., 1955).

The shallow bedrock zone in northeastern Illinois underlies the glacial sediments and is mainly comprised of Silurian dolomite. The upper boundary of this zone is the erosional surface of the bedrock, which is commonly obscured by glacial sediments. The lower boundary is the upper Ordovician Maquoketa Shale. Water produced from the dolomite is obtained from fractures and solution openings (Hughes and others, 1966). The shallow bedrock aquifer zone receives some recharge locally from precipitation (Hughes and others, 1966).

The deep bedrock aquifer zones include the Cambrian-Ordovician aquifer and the Mt. Simon aquifer (Hughes and others, 1966). The Cambrian-Ordovician aquifer contains two major zones, the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian-Ordovician zone is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely used where water requirements are less than 200 gallons per minute (gpm). This unit has a hydraulic conductivity between 9 and 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq.ft.). Recharge to the deep bedrock aquifers is mostly from west and north of the six county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system.

The Mt. Simon aquifer is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement rock. The average hydraulic conductivity of this aquifer is 16 gpd/sq.ft. (Hughes and others, 1966) and recharge is largely from the outcrop region of Cambrian rocks in south-central Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Delta Colors facility occupies approximately one-half acre in an industrial area in Addison, DuPage County, Illinois. Addison has a population of about 32,000.

The Delta Colors facility is bordered on the north by Porter Cable, on the west by Barnebey and Sutcliffe Corp., on the south by Condor Tool and Manufacturing and DuAll Inc., and on the east by Trans-Shape Inc. The nearest school, Schafer School, is located about three-quarters mile south of the facility. Facility access is controlled by Schaumberg Securities, which operates 24 hours a day. The nearest residential area is approximately one-quarter mile south of the facility.

The nearest surface water body, Salt Creek, is approximately one-and-a-quarter miles east of the facility. It is used for recreational purposes. There are two wetlands within one-half mile of the Delta Colors facility.

Groundwater was used as a public drinking water supply until April 1, 1992. The nearest public drinking water well was approximately one-half mile north of the facility. The ground-water gradient in the area is unknown. According to the Village of Addison, the Village completed a switch from groundwater to Lake Michigan water, supplied by the City of Chicago, on April 1, 1992 (Village of Addison, 1992a).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the one SWMU identified during the PA/VSI. The following information is presented for the SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations. Figure 2 shows the SWMU location.

SWMU 1	Drum Storage Area
Unit Description:	The drum storage area is on the north side of the building, above ground and outdoors. The unit measures approximately 75 feet by 15 feet. The unit is an asphalt covered pad (Photograph No. 1). There are no drains in the area, but surface runoff flows east along the back of the building then south into storm sewers in Gerri Lane and ultimately to Salt Creek.
Date of Startup:	This unit is likely to have begun operating in 1970. This date is an estimate.
Date of Closure:	The unit has been inactive since March 1990, when Delta Colors vacated the property. The unit was not a RCRA hazardous waste management unit according to the IEPA (IEPA, 1988a) and therefore, did not have to go through RCRA closure. The facility stopped handling the spent cleaning solvent in 1982 when they changed their floor cleaning method.
Wastes Managed:	This unit managed spent cleaning solvent, along with drums of raw material and finished inks. The cleaning solvent was a mixture of 70% mineral spirits, 25% perchloroethane, and 5% methylene chloride. Temporarily stored cleaning solvent was ultimately removed from this unit and taken offsite for solvent blending.
Release Controls:	This unit is an asphalt pad, without berms or catch drains.
History of Documented Releases:	The following release from this unit was documented: In 1985, the Addison Fire Department complained to the IEPA about an ink spill and generally sloppy drum management in this handling area. An IEPA

inspector advised that the material be sampled and cleaned up. No record of these actions was discovered.

Observations: The facility was vacant and the unit was not being used to store drums during the VSI. The area was covered with an undamaged asphalt pad and no visible evidence of release was noted during the inspection.

4.0 AREAS OF CONCERN

AOC 1 Water Discharge Area

This is an area on the southeast corner of the facility that received a non-contact cooling water and water from the two sunken loading docks. The area is an asphalt covered lot. Water is discharged from a pipe in the east wall of the facility (no photograph). The pipe may have been used to discharge water since 1970 when the facility opened. The pipe is still used to discharge water from the loading docks. On June 3, 1986 the owner of the facility on the east side of the facility complained to IEPA that a colored fluid had been discharged onto his property. An IEPA inspector indicated the problem would be referred to the Division of Water Pollution Control.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified one SWMU and one AOC at the Delta Colors facility. Section 2.0 presents background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors. Section 3.0 presents SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition. Section 4.0 discusses the AOC. BVWST's conclusions and recommendations for the SWMU follow. Table 3 summarizes the SWMU and AOC at the Delta Colors facility and recommended further actions.

SWMU 1 **Drum Storage Area**

Conclusions: The potential for release from the drum storage area to the groundwater, surface water and air is low. The potential for release to the on-site soils is moderate. The unit is inactive. The unit handled 55-gallon drums of cleaning solvent as well as virgin materials from 1920 unit 1990. One documented release was noted to on-site soils around the unit in 1985. No record of IEPA advised sampling or cleanup was found.

Recommendation: BVWST recommends the soils under this unit be sampled.

AOC 1 **Water Discharge Area**

Conclusions: The potential for release from the water discharge area to the surface water and on-site soils is moderate. Water was observed being discharged from the pipe. Also, a complaint that colored water was being discharged was filed in 1986. Any fluids spilled in the loading dock may have been discharged via the pipe to the area. The potential for release to the groundwater and air is low.

Recommendations: BVWST recommends the flow and constituents of the water discharge be further investigated. Also, the findings of the IEPA Division of Water Pollution Control should be investigated.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Drum Storage Area	1970 to 1990	Documented release in 1985	Sample soils of this unit

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Water Discharge Area	1970 to Present	Water observed being released during VSI, complaint of release in 1986	Further investigation

REFERENCES

Berg, R.C. et al., "Potential for Contamination of Shallow Aquifers in Illinois", Illinois State Geological Survey, Circular 532, 1984.

Berg, R.C. and J.P. Kempton, "Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of 15 Meters", Illinois State Geological Survey, Circular 542, 1988.

Bergstrom, R.E. et al., "Groundwater Possibilities in Northeastern Illinois", Illinois State Geological Survey, Circular 198, 1955.

CFR, 1990. Code of Federal Regulations, Section 261.32.

Delta Colors, 1982. IEPA, Special Waste Hauling Manifest, No. 0706783, October 21.

Delta Colors, 1990. Facility notification amendment or withdrawal form, February 1.

FEMA, 1987. Federal Emergency Management Agency, Flood Insurance Rate Map, Village of Addison, DuPage County, Illinois, Panel 8, Community Panel Number 170198 0008 B, January, 16.

Heritage, 1980. RCRA Part A permit application, October 5.

Hughes, G.E. et al., "Bedrock Aquifers of Northeastern Illinois", Illinois State Geological Survey, Circular 406, 1966.

Illinois Environmental Protection Agency (IEPA), 1976. Water Quality Management Basin Plan, Phase I-Des Plaines River/Lake Michigan, Volume I-Existing Water Quality, July.

IEPA, 1982. RCRA inspection report, March 5.

IEPA, 1985a. Complaint memo to the Division of Land Pollution Control (DLPC) from the Addison Fire Department, September 4.

IEPA, 1985b. Follow-up inspection report by DLPC, September 9.

IEPA, 1986a. Complaint memo to the DLPC, from Brian Roselli, June 3.

IEPA, 1986b. Follow-up inspection report by the DLPC, June 17.

IEPA, 1987. RCRA inspection report, November 11.

IEPA, 1988a. Memo from Chuck Gruntman to the DLPC file, April 13.

IEPA, 1988b. Correspondence addressed to Delta Colors, May 27.

IEPA, 1989. RCRA inspection report, December 4.

NWB, 1991. National Weather Bureau, O'Hare Airport, phone conversation, November 8.

Ruffner, J.A., "The Weather Almanac", Gales Research Company, Detroit, Michigan, 1977.

U.S. Department of Agriculture, "Soil Survey of DuPage and Cook Counties", 1979.

U.S. Department Fish and Wildlife Service, National Wetland Inventory Maps, Elmhurst quadrangle, November 1981.

U.S. Geological Survey, Topographic maps, 7.5 minute series, Elmhurst quadrangle, 1980.

Village of Addison, 1992a. Phone conversation between BVWST and the Department of Public Works, April 1.

Village of Addison, 1992b. Phone conversation between BVWST and the Department of Environmental Services, May 26.

Willman, H.B., "Summary of the Geology of the Chicago Area", Illinois State Geological Survey, Circular 460, 1971.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	IL D 050 562 214

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
Heritage Ink Co./Delta Colors	310 Gerri Lane

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Addison	IL	60101	DuPage		

09 COORDINATES: LATITUDE	LONGITUDE
41° 54' 34" N	87° 59' 45" W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Go north on Addison Rd. from the intersection with North Ave., to Factory Rd. Go west on Factory to Westgate Rd. Go south on Westgate to Gerri Lane. Go west on Gerri Lane. Enter the facility at 310 Gerri Lane.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing residential)
John Mavigliano	1130 S. Michigan, Apt. 3410

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Chicago	IL	60605	(312) 663-5137

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 10 /05 /80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 03/25/92 ☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): B&V Waste Science and Technology Corp.

02 SITE STATUS *(Check one)*

☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1970 (BEGINNING YEAR) 1990 (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Heritage Ink and Delta Colors used a hazardous floor cleaning solvent (D001) to clean up ink spills at the facility.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Potential release of hazardous constituents to onsite soils.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Stephen Mehay		BVWST	(312) 346-3775	03/25/92 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Heritage Ink/Delta Colors Inc.
310 Gerri Lane, Addison Illinois
ILD 050 576 214

Date:	March 25, 1992
Facility Representatives:	John Mavigliano, property owner Larry Raphael, Mr. Mavigliano's attorney
Inspection Team:	Stephen Mehay, B&V Waste Science and Technology Corp. (BVWST) Tonya Hay, BVWST
Photographer:	Tonya Hay
Weather Conditions:	Calm, overcast, temperature about 45F
Summary of Activities:	The visual site inspection began at 9:30 a.m. with introductions. The facility representatives discussed past tenants and future plans for leasing the facility. A tour of the facility began at 9:45 a.m. The entire facility was inspected, including the drum storage area, and the area was photographed. The tour concluded at 10:30 a.m. and the team left the facility.

Photograph No. 1
Orientation: West
Description: Drum storage area, on the northern side of the building

Location: SWMU 1
Date: 3-25-92

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

3/25/92

Stephen Mohay / BVWST
Tanya Hay

Larry Raphael
John Mavigliano
Cool Temp 40's cloudy
9:30 arrive

Start walk through

12,000 square feet Total Area
Pump from front loading dock - Pipe routed to East side of facility.

Delta Colors - on North Ave in Sycamore IL.

In 1989 Mavigliano received letter of violation from Addision.

Building empty - NO machinery, when delta colors left disrepair, Attempts made to repair were half hearted.

Built ~1970 Colonial Ink
Name to Heritage

(1)

Heritage Ink bought out by Delta Colors March 1981. Legal corporate buy out. Five year lease w/ Five year option. Delta Colors moved out March 1990.

Building completely empty

Plugged - Clogged floordrains
east side middle of build
5 plugged wholes in the area

Photo 1. - East - East side of building
plugged floordrains

photo 2. East - Machinery fixed to the floor.

- 1 ceiling vent North wall towards the top.

Loading docks - NW corner and
South west corner.
Sump by SW dock.

Roof drains on East side.
NW dock drained to the
East side.

(4)

photo 3 - west, North (Back) side of building.
All asphault. slopes South towards the building.

photo 4 - South - Back side of building
Drum imprints near SW
loading dock.

Very Northwest corner gravel

Minor ink stains on the west wall near the NW dock.
Both docks cracked and deteriorated.

East side asphault and gravel lot.
Drain from SW dock.

Small drain pipe on East side
unknown use - maybe cooling water
drain from 9/6/86 inspection.

All water - surface Drains to gerri lane
photo 5 - North - Inside of main facility

(5)

photo 6. north, inside of the main building
West side.

photo 7 · West - possible mixing area

two floor drains and imprints from machinery.

Overall concrete intact - some minor cracks, few large cracks.

North properties - ~~Boat Building~~, Porter
West - Barneby + Sutcliff
South - Condor Tools - DuAll Precision
East - Trap Sharp

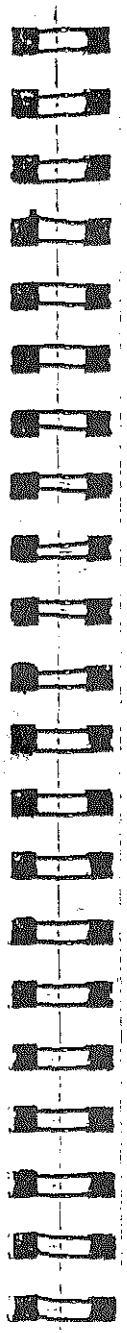
Area is industrial park.

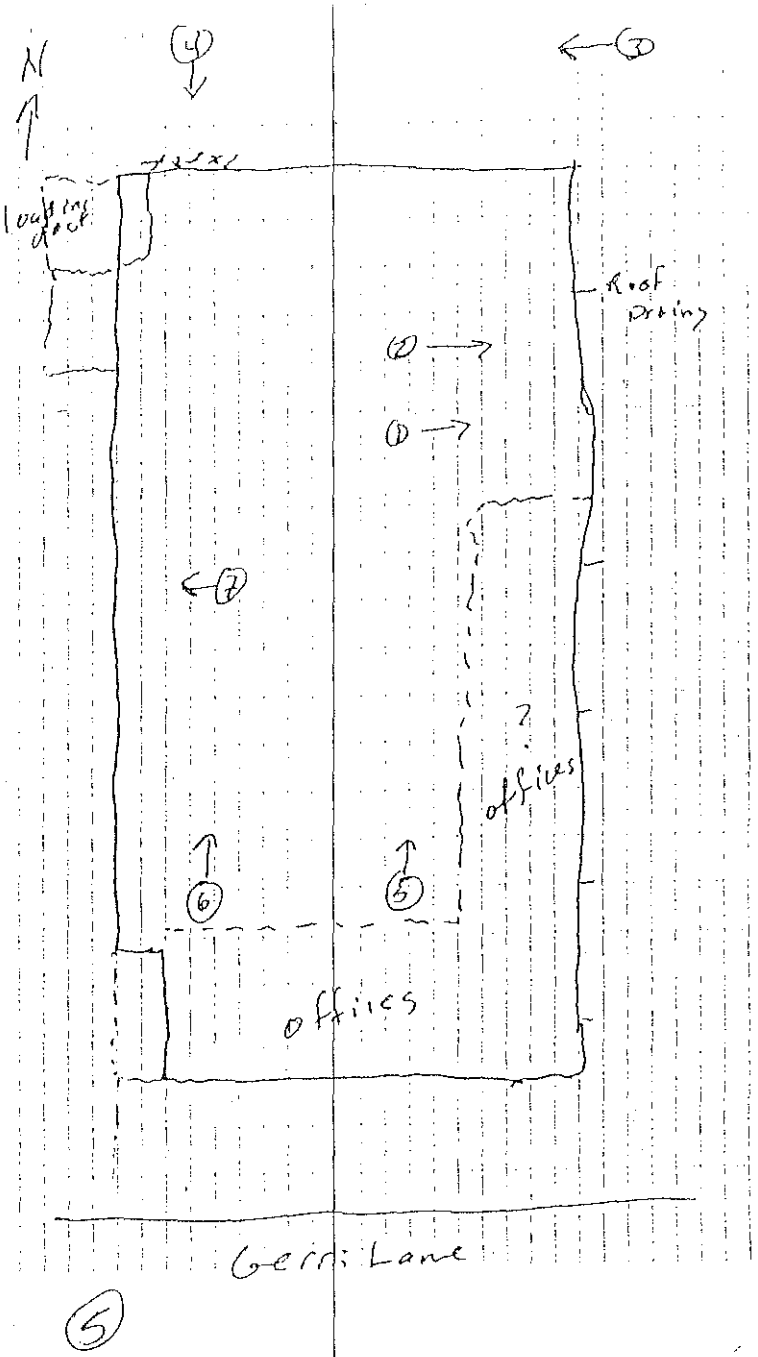
Acreage ?

Currently Schoonberg Scavitros operating 24 hrs/day. sprinkler system for fire

10:30 left the facility

(4)





(5)

ATTACHMENT D

IEPA MEMO DESCRIBING SPENT CLEANING SOLVENT

4-15-88 A

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 13, 1988

TO: Division File

FROM: Chuck Gruntman IPC, FOS, Maywood

SUBJECT: 043005 0005
Delta Color (Heritage Ink)
ILD 050576214
~~FOS~~ RCRA - Permit

On 4-13-88 I talked with Mark Kubert from EXXO North Chicago, IL. Mr Kubert confirmed that his company sold a floor cleaner, to Delta Color. He claimed that Delta Color made only one purchase of 2 drums around January 1982. Kubert stated that this product contained 70% Mineral Spirits,
25% Perchloroethane
5% Methyene Chloride

Because of the RCRA Regulations in effect before 1984, spent floor cleaner containing a mixture of solvents would not have been a "Listed" hazardous waste. It would have been regulated as a D001 - ignitable hazardous waste.

Per the company's manifest records for this waste, it went to American Chemical Services, which routinely blended waste solvents into secondary fuel, i.e., recycling. Again, because of the RCRA Regulations in effect before 1984, characteristic hazardous waste sent for recycling was exempt from the regulations under 725.106.

Therefore, it appears that by the RCRA Reglations in effect at the time, Delta Color Did Not Store Regulated hazardous waste, and they can withdraw their Part A without completing "RCRA" closure.

CG:lb

cc: Region File
Phyllis Reed

IEPA/DLPC

IL 532-0570

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

March 24, 1992 HRE-8J

Mr. John Mavigliano
1130 S. Michigan Ave.
Apt. 3410
Chicago, IL 60605

Re: Visual Site Inspection
Heritage Ink (Delta Colors)
Addison, IL
ILD 050 576 214

Dear Mr. Mavigliano:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104 (e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs), and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment 1. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs

of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for March 25, 1992 at 9:30 a.m. The inspection team will consist of personnel of B&V Waste Science & Technology Corp., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francine Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francine M. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Attachment

cc: Larry Eastep, IEPA, Springfield
Gliff Gould, IEPA, Maywood

mas/rfa

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

HRE-8J

SEP 16 1992

Mr. Lawrence M. Raphael
Attorney And Counselor At Law
77 West Washington Street
Suite 1018
Chicago, Illinois 60602

Re: Heritage Ink Company/Delta Colors
ILD 050 576 214

Dear Mr. Raphael:

Per your request of June 9, 1992, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

ORIGINAL SIGNED BY
KEVIN M. PIERARD

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

cc: Eric Friedman, FK & K
2100 Manchester Road
Suite 203
Wheaton, Illinois 60187

HRE-8J:FHARRIS:6-2884:9/16/92:MASTER.RES/LIST2

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	FH 9/16/92	9/16/92	

Lawrence M. Raphael
ATTORNEY AND COUNSELOR AT LAW
77 WEST WASHINGTON STREET / SUITE 1018
CHICAGO, ILLINOIS 60602

(312) 782-2546 / FAX (312) 332-3485

June 9, 1992

United States Environmental
Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Attn: Ms. Francene D. Harris

Re: Mr. John Mavigliano
Visual Site Inspection Heritage Inc. (Delta Colors)
Addison, IL
ILD 050 576 214

Dear Ms. Harris:

Please be advised that I represent Mr. John Mavigliano regarding the enclosed letter. I have spoken to Mr. Mehay from B & V Waste Science who prepared the report and he indicated that I should contact you to obtain a copy of the same. I would appreciate that you contact me and I will arrange for someone from my office to pick up the report.

I appreciate your cooperation in this matter.

Sincerely,

LAWRENCE M. RAPHAEL

LMR:cp
Encls.